

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

)	
In re:)	Case No. 13-53846
)	
CITY OF DETROIT, MICHIGAN,)	In Proceedings Under
)	Chapter 9
Debtor.)	
)	Hon. Steven W. Rhodes
)	
)	

**MOTION TO SET AN EXPEDITED HEARING ON
WAYNE COUNTY’S MOTION UNDER 11 U.S.C. §105(d)(1) FOR A STATUS
CONFERENCE ON, AND APPOINTMENT OF A FACILITATIVE MEDIATOR WITH
RESPECT TO, ISSUES RELATED TO THE FUTURE OF THE DETROIT WATER
AND SEWERAGE DEPARTMENT**

Wayne County, Michigan, a Michigan Constitutional corporation, a party-in-interest in this case, by and through its County Executive, Robert A. Ficano (“Wayne County”), states:

Background:

1. On April 10, 2014, Wayne County filed its Motion Under 11 U.S.C. §105(d)(1) for a Status Conference On, and Appointment of a Facilitative Mediator With Respect To, Issues Related to the Future of the Detroit Water and Sewerage Department (the “Motion”).

2. The Court’s Mediation Order, DE 322 provides that “After consultation with the parties involved, the Court may order the parties to engage in any mediation that the Court refers in this Case.”

3. The Motion sets forth the nature of the dispute related to the future of the Detroit Water and Sewerage Department (“DWSD”), and its vital nature to the efficient resolution of this case, to Oakland, Macomb and Wayne Counties (together, the “Counties”), and to the 4 million residents served by DWSD.

4. The Motion also sets forth the reasons Wayne County believes that mediation would help the parties to a resolution of this contentious matter.

5. The issues are unquestionably complex and resolution may take significant time. Accordingly, in order to avoid delay of Plan confirmation, commencement of mediation at the earliest possible date is in the best interests of all parties.

6. Therefore, pursuant to L.B.R. 9006-1 (E.D. Mich.) Wayne County requests that the consultative hearing contemplated by the Mediation Order be scheduled on an expedited basis.

WHEREFORE, Wayne County requests that this Honorable Court schedule a hearing on the earliest possible date to consult with the parties about mediation.

Respectfully Submitted,

BUTZEL LONG, a professional Corporation

/s/ Max J. Newman

By: Max J. Newman (P51483)

By: Beth Gotthelf (P38951)

Attorneys for Wayne County

Stoneridge West

41000 Woodward Ave

Bloomfield Hills, MI 48304

(248) 258-2907

newman@butzel.com

Dated: April 10, 2014